

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

**Civ. No. 12-563 SMV/ACT**

\$145,419.00 IN UNITED STATES CURRENCY,

FUNDS IN THE AMOUNT OF \$33,775.42  
FROM BANK OF AMERICA ACCOUNT \*4352,

FUNDS IN THE AMOUNT OF \$13,970.49  
FROM BANK OF AMERICA ACCOUNT \*3181,

*Defendants,*

*and*

MICHAEL LEE,  
JENNIFER LEE,  
BEST CHINESE MASSAGE,

*Claimants.*

**SETTLEMENT AGREEMENT AND RELEASE**

The United States and Claimants Michael Lee and Jennifer Lee, individually and on behalf of Best Chinese Massage, agree as follows:

1. The United States will return **\$116,135.94** of Defendant Currency, less any debt owed to the United States, any agency of the United States, or any other debt which the United States is authorized to collect from Claimants Michael Lee and Jennifer Lee, individually and on behalf of Best Chinese Massage.
2. All right, title, and interest of Claimants Michael Lee and Jennifer Lee, individually and on behalf of Best Chinese Massage, in the remaining **\$77,028.97** of Defendant Currency will be forfeited to the United States and title thereto vested in the United States.
3. The parties will bear their own costs and attorney's fees in this case.

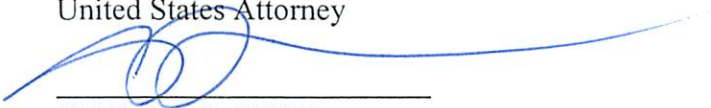
4. Entry of a Certificate of Reasonable Cause pursuant to 28 U.S.C. § 2465 is appropriate.

5. The terms of Settlement Agreement and Release constitute full settlement and satisfaction of any and all claims by Claimants Michael Lee and Jennifer Lee, individually and on behalf of Best Chinese Massage, to the Defendant Currency.


6. Claimants Michael Lee and Jennifer Lee, individually and on behalf of Best Chinese Massage, release and forever discharge the United States, including but not limited to the United States Department of Justice, U.S. Homeland Security Investigations (HSI), and any state or local law enforcement agency, and their agents and employees, acting in their individual or official capacities, from any and all claims, rights or causes of action, damages, expenses and costs, known or unknown, which he has or may have against these government agencies and their employees and agents arising from, related to, or as a result of, any actions with respect to the Defendant Currency.

7. Claimants Michael Lee and Jennifer Lee, individually and on behalf of Best Chinese Massage, shall hold harmless the United States, including but not limited to the United States Department of Justice, HSI, and any state or local law enforcement agency, and their agents and employees, acting in their individual or official capacities, from any and all claims, rights or causes of action, damages, expenses and costs, known or unknown, which they or any third parties, heirs, successors, agents, subrogees, or assigns, have or may have against these government agencies and their employees and agents arising from, related to, or as a result of, any actions with respect to the Defendant Currency.

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AGREED:



Date 6-6-12

MICHAEL LEE, Claimant  
Individually and on behalf of Best Chinese Massage

AGREED:



Date 6-6-12

JENNIFER LEE, Claimant  
Individually and on behalf of Best Chinese Massage

APPROVED:

  
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